

Exhibit 32:

A.J. Declaration

DECLARATION OF A.J.

1. I am a current registrant of the Michigan Sex Offender Registry. I am 46 years old and was convicted of using the internet to commit a crime in 2004 when I was 27 years old. I was given three years of probation and added to the sex offender registry for 25 years. I am a tier II registrant and have been on the registry for over 18 years; I am due to come off the registry in 2029.

2. One of the biggest issues I have with the registry is the fact that my picture is on it. The picture is lifted from my driver's license, so it is always current. Having a current photo on the website is embarrassing and gives the impression that everything is fresh and I just committed a crime yesterday. The picture is new, so it seems like the person I am today did the crime even though I am a very different person today than I was at 27. I have not even had so much as a traffic ticket since 2004.

3. Since I initially pled guilty, the registry has changed a lot. More requirements get imposed with absolutely no explanation. When I was first added to the registry, pictures were not on the website. The internet has changed a lot in the last two decades as well. It is now the main place people go for information and social interaction. For me that means, because I am listed on the internet as a sex offender—with my picture—that is often the first thing people find out about me. If I had known about all of the changes and requirements that have been added to the registry, especially about the way I would be affected by having a current photo of me on the

website, I would have never accepted a plea deal. I wish I would have fought it because the registry now restricts every part of my life.

4. I earned an MBA from Central Michigan University in 2007 and have used it to become one of the top employees at the company I've worked for the last 12 years. Because my job is forward facing, however, I often have to deal with my clients discovering my registry status. I deal with clients all over the United States so people often Google me when they cannot see me in person; one of the first things that pops up when they do is the registry. This has resulted in me losing accounts. For example, one pair of clients brought up to the management of my company they did not want to work with me specifically because of the registry. I have not been able to move into a management position at my current job despite being named top employee because the company fears putting me in an executive position given my registry status.

5. Prior to my current job, I had a lot of trouble finding and keeping work. I have lost numerous jobs and opportunities, usually as a result of coworkers discovering that I am on the registry. Around 2008 I began working for a company that purchased the company I was employed with. The new company did not require background checks in order for us to stay on. After some time working there, a coworker discovered my registry status after Googling me. This coworker then mailed an anonymous letter to the company with a printed flyer of my registry information

included. I was let go from the company, as they told me, specifically because I had shown up on the registry. I was denied similar jobs because of my registry status and spent nearly 3 years unemployed before eventually landing my current job.

6. I've been married for five years and have two children aged 14 and 2. My family has consistently experienced harassment as a result of my registry status. My 14-year-old son started experiencing harassment last year. He never knew I was on the registry—I had not been ready to have that conversation with him. But the neighbors found out and told their kids. Once that happened, they began taunting my son about it. He's come home upset about this multiple times as he's being harassed by both friends and neighbors who ridicule and isolate him.

7. All of the changes to SORA over the years have made it hard and confusing to keep up with. I don't know what I need to report, what I don't need to report, and when I'm meant to report it. With all of the changes, I never feel comfortable signing the explanation of duties form—I'm not ever clear what all of it means. If I say I understand it because I am obligated to sign, though, then I am in jeopardy of going to prison for violating something I do not understand.

8. The level of restrictions and supervision makes the registry feel a lot like parole. I am not able to do anything freely. I have to report frequently and provide personal information. I am in constant fear that I can be arrested at any time.

9. Being on the registry is different from simply having a sex conviction because while a conviction ages, the registry will always appear as if you committed your crime yesterday, and remain dangerous to everyone today. The date of the crime has to be checked separately, and I doubt people even get to it, let alone figure out that the crime happened long ago. Someone with an old conviction has significantly fewer hindrances than someone on the registry, and a background check based on a person's name would be required to even get information on the conviction whereas the registry information is just accessible to everyone on the internet.

I, A.J., certify under penalty of perjury that the above statements are true and correct to the best of my knowledge and belief pursuant to 28 U.S.C. § 1746.

A.J.
(name on file with Plaintiffs' counsel)

Dated: March 10, 2023